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States Government

Department of Energy

Rocky Flats Office

Memorandum

JUL 13 10 03 AM '93

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(JUL 12 1993)

WPD-JJR 08002

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

Fiscal Year 1993 and 1994 Strategy for Selection of Treatment Technologies for Rocky Flats Combustible Mixed Wastes

Jill E. Lytle, Deputy Assistant Secretary for Waste Management, EM-30, HQ
Clyde W. Frank, Deputy Assistant Secretary for Technology Development, EM-50, HQ

As you are aware, the treatment of combustible mixed wastes at Rocky Flats has become a major focus of our compliance-related technology development efforts for Land Disposal Restricted (LDR) mixed waste. The decision whether or not to construct a thermal treatment unit at Rocky Flats for this waste appears to be a significant public policy decision to be faced by the Rocky Flats waste management program. Members of Headquarters EM-30 and EM-50 staffs, Rocky Flats Office Waste Programs Division and EG&G met on May 27, 1993, to identify key elements of a strategy to be implemented in Fiscal Years 1993 and 1994 for selecting the most appropriate technology for combustibles.

Key elements of our strategy are attached, we ask that you review these and transmit any comments or concerns to us as soon as possible. Pending any comments you may have, we intend to follow this general strategy in directing contractor activities, formulating our public involvement plans and developing deliverables pursuant to the Federal Facilities Compliance Act.

If you have any questions or comments regarding this strategy, contact me at (303) 966-4440, Tom Lukow at 966-4561 or John Rampe at 966-6246.

Michael S. Karol

Michael S. Karol
Assistant Manager
for Facility Operations

ACTION	
DIST	LTR ENC
BENEDETTI, R.L.	<input checked="" type="checkbox"/>
BENJAMIN, A.	<input checked="" type="checkbox"/>
BERMAN, H.S.	<input type="checkbox"/>
CARNIVAL, G.J.	<input type="checkbox"/>
COPP, R.D.	<input type="checkbox"/>
CORDOVA, R.C.	<input type="checkbox"/>
DAVIS, J.G.	<input type="checkbox"/>
FERRERA, D.W.	<input type="checkbox"/>
HANNI, B.J.	<input type="checkbox"/>
HEALY, T.J.	<input type="checkbox"/>
HEDDAHL, T.G.	<input checked="" type="checkbox"/>
HILBIG, J.G.	<input checked="" type="checkbox"/>
KIRBY, W.A.	<input type="checkbox"/>
KUESTER, A.W.	<input type="checkbox"/>
LEE, E.M.	<input type="checkbox"/>
MANN, H.P.	<input type="checkbox"/>
MARX, G.E.	<input type="checkbox"/>
McKENNA, F.G.	<input type="checkbox"/>
MORGAN, R.V.	<input type="checkbox"/>
PIZZUTO, V.M.	<input type="checkbox"/>
POTTER, G.L.	<input type="checkbox"/>
RILEY, J.H.	<input type="checkbox"/>
SANDLIN, N.B.	<input type="checkbox"/>
SATTERWHITE, D.G.	<input type="checkbox"/>
SCHUBERT, A.L.	<input checked="" type="checkbox"/>
SETLOCK, G.H.	<input checked="" type="checkbox"/>
SHEPLER, R.L.	<input type="checkbox"/>
SULLIVAN, M.T.	<input type="checkbox"/>
SWANSON, E.R.	<input type="checkbox"/>
WILKINSON, R.B.	<input type="checkbox"/>
WILSON, J.M.	<input type="checkbox"/>
WANE, J.O.	<input type="checkbox"/>
Anderson	<input checked="" type="checkbox"/>

Attachment

cc w/Attachment
P Bubar, EM-323
J Rhoderick, EM-351
J Taylor, EM-55
R. Di Salvo, RPB, RFO
R. Tyler, RPB, RFO
T Hedahl, EG&G
S Anderson, EG&G

cc w/o Attachment
D Ruscitto, AMFO, RFO
T Lukow, WPD, RFO
J Rampe, RPB, RFO



GROUP	ACT	INFO
11000		
ERM		
11011		
PIR		
11111		
RPM		
120		
58E		
1130		
SPP		
11400		
FOM		
11500		
RLD		
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SM		
11700		
GS		

CORRESPONDENCE CONTROL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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Reviewed for Addressee
Corres Control RFP

7-13-93
DATE BY

Ref Ltr #

ADMIN RECORD

Key Elements of the Rocky Flats Proposed Strategy to Select
Treatment System(s) for Combustible Wastes

- 1) Continue Developmental Work for a Fluidized Bed Incinerator (FBI) -- The FBI remains Rocky Flats' baseline pathway toward achieving Land Disposal Restricted (LDR) compliance for combustible wastes and as such cannot be abandoned until and unless definitive alternatives are found. Work in FY 1993 and 1994 will concentrate on cold tests to optimize facility design and demonstrate its effectiveness on Rocky Flats wastes. In other respects, we will direct that development work be non-site-specific, to allow this work to be usable by any other sites that may wish to examine the applicability of this technology
- 2) Continue Development of Incineration Alternatives, with Down-Selection -- A number of technology development projects are ongoing at Rocky Flats as alternatives to thermal treatment. These include various chemical oxidation techniques and biodegradation, among others. We believe that this pathway should proceed, but that the number of current projects is too large given likely budget constraints in FY 1994. Therefore, we are directing EG&G to implement the Technology Selection Decision Document (TSDD) for this suite of technologies to begin the process of down-selection. We envision that no more than two incineration alternatives will be carried forward into FY 1994
- 3) Expedite the Testing of Debris Rule Minimal Technologies on Combustible Waste -- Most combustible mixed waste at Rocky Flats is hazardous debris and subject potentially to the minimal technology treatments now allowed under the debris rule. These treatments include solidification by polymer or cement, and vapor desorption of organic compounds. We are directing EG&G to initiate expedited testing of these methodologies, and have solicited assistance from the Los Alamos Technology Office to evaluate systems for thermal desorption. EM-50 has provided initial funding for expedited testing. Testing will proceed with full participation of our regulators, and in coordination with the Nevada Test Site, where the treated waste is planned to eventually be disposed. We will ask for Headquarters' assistance in facilitating this latter interaction
- 4) Public Participation -- We will invite active public participation in implementing this strategy. We anticipate reconvening the Citizens' Review Group (CRG) later this summer to provide us with input on use of the TSDD to select incineration alternatives to carry forward into FY 1994. We also anticipate presenting the key elements of our strategy regarding the selection of treatment technologies for combustibles in a larger public forum, such as the Colorado Council on Rocky Flats. The CTMP Public Involvement Plan is being revised by EG&G to reflect these, and will be forwarded to Headquarters when completed.
- 5) Regulatory Interface -- Regulators have already been briefed via the monthly LDR project managers' meetings on many of the aspects of this strategy, including the pursuit of debris rule minimal technologies for treatment of combustibles. Reactions have been favorable, albeit at an informal level. We expect that the schedules found in the CTMP, which will be carried through to the proposed new LDR mixed waste Compliance Agreement, will still form a basis for waste management technology development at Rocky Flats. One particular milestone, now scheduled for June 1994, calls for a decision to be made (and, implicitly, our regulators and the public notified) as to whether or not to proceed with pursuing a Part B permit for a thermal treatment unit. Given the obvious implications of this milestone, we believe that our technology development and implementation strategy outlined above should point toward final selection of the treatment option(s) for Rocky Flats' combustible wastes to support this milestone. Given the pivotal nature of the milestone, recommending extending the milestone to October 1994 is being considered to correspond to the beginning of the fiscal year, and to assure that all relevant data can be gathered in time to support a decision on treatment of combustibles.